

28 March 1955

MEMORANDUM FOR: General Tax File

SUBJECT : Declaration of Estimated Tax - '54 Code

1. Reference § 6654 Internal Revenue Code - '54 - the "annualization" of income and assessment of interest and penalties on the Declaration applies only in the event that there is an underestimate of tax in excess of the 30% margin permitted under the New Code. In any event, the penalty does not apply where the estimate is based on the previous year's income subject to current rates, exemptions, etc.

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Assistant General Counsel

OGC,

- 1 - General Tax File
- 1 - OGC 350 South
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